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ABSTRACT

A policy statement on the accreditation process as adopted by the Council on Postsecondary Accreditation (COPA) is presented. The process requires an honest, rigorous self-analysis, an on-site evaluation by a team of peers, a team report, a review by an accrediting body, and final action defining the accredited status of the institution or program evaluated. It is necessary to have respect for confidentiality of information. The purposes and process are endangered when disclosure of aspects of the process inhibits the institution's or program's ability to provide full information and assess itself candidly and the accrediting body's ability to render sound judgement. Though this is a private process, accrediting decisions are used as a consideration in many formal actions by different publics. Thus, accrediting bodies have come to be viewed as quasi-public entities operating for the public interest. Legitimate needs of accrediting bodies must be reconciled with broader societal needs requiring disclosure of basic and essential information. Relevant considerations are discussed. Five principles relevant to disclosure are listed. Guidelines for accrediting bodies on disclosure of accrediting information relate to: information that must be published and disseminated; information that should be published relevant to affiliation status; information available upon request; information available only from the institution, or by the accrediting body with the consent of the institution; information necessary to correct misrepresentation; and information not available for dissemination under any circumstances. (SM)

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Policy Statement
on

Disclosure, Confidentiality and the Integrity of the Accrediting Process

Adopted by the COPA Board
on
October 11, 1984

Council on Postsecondary Accreditation

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The process of accreditation has a two-fold purpose—the *assessment* and the *enhancement* of the educational quality of an institution or program. The process requires an honest, rigorous self-analysis, an on-site evaluation by a team of peers or a validated equivalent of an on-site review, a team report, a subsequent review by an accrediting body, and final action defining the accredited status of the institution or program thus evaluated. Concern for the integrity and effectiveness of the investigative and deliberative process involves *respect for confidentiality of information* required and evaluated. The purposes are endangered and the process is weakened when disclosure of aspects of the process inhibits both the institution's or program's ability to provide complete information and assess itself candidly and the accrediting body's ability to render sound judgments.

The relationship between the accrediting body and the institution or program is private and voluntary. Accrediting decisions are, however, used as a consideration in many formal actions by different publics—government funding agencies, scholarship commissions, foundations, employers, counselors, and potential students. Accrediting bodies have thus come to be viewed as quasi-public entities operating "for the common good" or "in the public interest," with certain responsibilities to the many groups which interact with the educational community. Thus the legitimate needs of accrediting bodies or those of their members for maintaining and preserving the integrity of the process must be reconciled with broader societal needs requiring *disclosure of basic and essential information.*

Relevant Considerations

Any attempt to reconcile the conflicting pressures for disclosure and for confidentiality involves consideration of several dimensions which serve to define the options available. First and foremost is the recognition that, since the public interest lies in the assurance that the institution or program is in fact achieving appropriate educational objectives and meeting established standards, the purpose of *quality-assessment* establishes the specific context within which aspects of the process are to be considered confidential or disclosable.

Within the context other factors must be considered by accrediting bodies as they develop clear and coherent policies on release of information. The *timing* of disclosure may in some instances be critical

to preserve the integrity of the process and to provide correct information. The *extent* of disclosure may also be critical. Not all information gathered requires full disclosure, and such disclosure may neither serve the public interest nor help the institution. The *substantive relevance* of information to the purpose of quality-assessment should also be a significant consideration. Further, since information may be provided for varied purposes in different ways, the *means* of dissemination may be a significant factor in providing the clearest context of understanding of the information.

Accrediting bodies also have a responsibility to understand the legal responsibilities that are imposed as a consequence of being considered quasi-public entities. COPA policy statements, guidelines, and **Provisions** for recognition (Part B in particular) acknowledge these obligations.[1]

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Principles Relevant to Disclosure

In addressing the specific issues relevant to disclosure of information on aspects of the accrediting process, the following principles, consistent with the COPA **Provisions** for recognition and the integrity of the accrediting process, are set forth:

1. Each accrediting body should have a clear statement of policy on what is to be reserved or kept confidential and what is to be disclosed with respect to documents generated in the accreditation process, information concerning decisions on accredited status, and information concerning the status of affiliation of the institution or program with the association.
2. Concern for maintaining and protecting the integrity and effectiveness of the accrediting process should play the major role in shaping accrediting body policies and procedures on disclosure of information.
3. Since quality-assessment defines the matrix within which items are to be considered disclosable or confidential, clear distinctions must be drawn between those substantively related to the de-

[1] An analysis of the judicial and legislative context relevant to the responsibilities of accrediting agencies is available from the COPA office. In addition, associations may find significant help in the COPA Occasional Paper by William K. Kaplin on **Accreditation and the Public Interest.**

termination of accredited status and those related to institutional or program improvement, e.g., between recommendations for action considered essential for maintenance of accredited status and advisory suggestions for the enhancement of the institution's or program's educational quality. The latter are not relevant for public disclosure.

4. Since the accreditation process involves the work of voluntary peer-evaluators, great care must be taken to ensure not only that the composition of visiting teams and review committees represents appropriate, relevant, and varied expertise, points of view and experience, but that evaluators are rigorously trained in good practices of securing and processing information essential for an objective and responsible review, and of reproducing this information in the reports or other communications developed.
5. In the development of policies and procedures for disclosure of information consistent with these principles and with COPA **Provisions** for recognition, accrediting bodies should take account of the following guidelines, organized according to five categories of disclosure.

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Guidelines for Accrediting Bodies on Disclosure of Accrediting Information

The following guidelines have been developed by COPA to assist accrediting bodies in determining the extent of disclosure essential to meeting their responsibilities to the many persons and groups which interact with the educational community, while maintaining the integrity and effectiveness of the self-regulatory process as a reliable authority in identifying quality in postsecondary education.

The relationship between the accrediting body and the institution or program is a contractual one, whether formal or informal. Legally the institution is the governing board or the corporate board of directors. When an institution is part of an educational system in which the institution's chief executive officer is in a line relationship to the chief executive officer of the system, this relationship should be taken into account in developing procedures for dissemination of information.

I. *Information which must be published and disseminated.*

A. *Information concerning the accrediting body.* The accrediting body must describe in official documents its scope, evaluative criteria, and procedures (**Provision** B.3.; C.4.), clearly delineating the process by which the accrediting decision is reached (**Provision** C.2.; C.4.) and the outcome of the process with respect to given institutions or programs (C.13.; C.14.).

B. *Information relevant to decisions on pre-accreditation or accreditation status.*

1. At least annually, in an official publication, a current listing of all institutions or programs with status in the accrediting body. (**Provision** B.4.)
2. At least annually, in an official publication,[2] all final decisions with respect to accredited status, affirmative and negative,[3] made during that year. (**Provision** B.4.) An institution or program which withdraws an application for status need not be identified. A decision to deny an initial application for status need not be published.
3. Any accrediting body procedures or policies for the release of additional information relevant to such decisions. (**Provision** B.3.)

II. *Information that should be published relevant to affiliation status.*

At least the following information should be published in an official publication concerning the status of affiliation of an institution or program with the accrediting body, unless the information is otherwise available. The information should be preceded by a statement of the accrediting body's scope of accreditation activities, and indications as to where additional information may be obtained.

[2] The publication need not necessarily be the same as the one listing current accredited status. It may appear in a newsletter, quarterly, or public portion of Commission/Board minutes.

[3] If an appeal of a negative decision is filed, the accrediting body may withhold the public announcement of the decision during such an appeal. (COPA policy statement **Accreditation and the Public Interest,** p. 4)

1. The name and address of the institution.
2. Designation of the institution's character and form of governance—public or private, nonprofit or profit, and whether it is part of a system.
3. Names of the chief executive officer, and, in the case of specialized programs, the name of the program director.
4. Accredited status:
   a. Date of initial accreditation.
   b. Date of most recent final action following a comprehensive evaluation.
5. Indication of whether degree-granting programs are offered at multiple program sites.
6. Level of offering—non-degree, associate, baccalaureate, professional, master's, doctoral.[4] (Specialized accrediting bodies will designate the level of program(s) accredited)

III. *Information which is available upon request.*

A. *Information relevant to affiliation status.*

At least the following information should be made available in response to inquiries from parties seeking information relevant to the status of a specific institution or program.[5]

1. Name and address of the institution.
2. Institution's character—public or private, nonprofit or for profit—with identification of proprietors of for profit institutions.
3. Accredited status.
4. Location(s) of offerings.[6]
5. Level of offerings.

[4] This information may be provided by special designation, i.e., "a, b, p, m, d" or other pattern; a general statement concerning the college's offering of programs in arts, sciences, and/or professional curricula at a particular degree-level or of courses at this level not applicable to degrees offered; reference to the institutional catalog; or reference to the COPA office for specificity concerning specialized accreditation of programs.

[5] Each accrediting body should maintain a brief history of the accredited status of all institutions or programs. The accrediting body may refer the inquirer to the institution for additional information, or develop with the institution a joint statement that both may use.

[6] Expanded information may be provided on off-campus sites (in-state, out-of-state, out-of-region, military bases, etc.) and/or the inquirer may be directed to the institution for such detail.

B. *Information concerning the accrediting body.*

1. Surveys, reports, etc., of the accrediting body.
2. A yearly list of scheduled visits.
3. The academic and professional qualifications of the members of its policy and decision-making bodies and its administrative personnel.

IV. *Information available only from the institution, or by the accrediting body with the consent of the institution.*

This category includes information supplied by the institution or program and/or the accrediting body in the course of the accrediting process and not incorporated in other public documents, such as the self-study, team report, recommendations of the team or intermediate review committee, institutional/programmatic responses to recommendations, and correspondence between the accrediting body and the institution related to the accreditation process.

Accrediting bodies should encourage institutions or programs to make publicly available information about their accredited status, and to share visiting team reports and institutional program responses with appropriate state agencies authorized to evaluate and approve institutional academic programs and therefore having a legitimate claim to information beyond that available to the general public.

V. *Information necessary to correct misrepresentation.*

If an institution or program releases information that misrepresents or distorts any action by the accrediting body with respect to any aspect of the accreditation process, or the status of affiliation with the accrediting body, the chief executive officer of the institution and the program director, where applicable, will be notified and informed that corrective action must be taken. If the misrepresentation or distortion is not promptly corrected, then the accrediting body may, at its discretion, release a public statement in such a form and content as it deems necessary to provide the correct information.

VI. *Information not available for dissemination under any circumstances.*

Certain relationships yield information which

legally cannot be disclosed without the consent of the person who provides it—for example, the relationship between physician and patient, between attorney and client, between clergy and penitent, etc. Should such information, or other information that is protected under law by a comparable privilege or safeguard, come into the hands of an accrediting body or evaluation team, its disclosure to persons other than the immediate recipients would of course be inappropriate and might even be legally actionable.